

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ELLE LALLI,

Plaintiff,

-v-

WARNER BROS. DISCOVERY, INC.;  
WARNER MEDIA, LLC U.S. SEVERANCE  
PLAN,

Defendants.

Civil Action No. 1:24-cv-03178-LJL

**PROPOSED ORDER**

**THIS MATTER** having been opened to the Court by Littler Mendelson, P.C., attorneys for Defendants Warner Bros. Discovery, Inc. and Warner Media, LLC U.S. Severance Plan (“Defendants”), for an Order pursuant to Fed. R. Civ. P. 8 to dismiss Plaintiff’s Complaint and to require Plaintiff to file a short and plain statement of her claims, for an Order dismissing Counts 3-4, 6-7, 9-10 and 12-13 of Plaintiff’s Complaint pursuant to Rule 12(b)(6), and for an Order transferring venue of this case to the United States District Court for the Northern District of Georgia pursuant to 28 U.S.C. § 1404(a); and the Court having considered the submissions in support thereof and in opposition to the requested relief, and for good cause shown,

IT IS on this \_\_\_\_\_ day of \_\_\_\_\_, 2024,

**ORDERED** that Defendants’ Motion to Dismiss and Motion to Transfer Venue to the United States District Court for the Northern District of Georgia is hereby granted in its entirety; and it is further

**ORDERED** that this case is transferred to the United States District Court of the Northern District of Georgia, and that this Court no longer retains jurisdiction over this matter.

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Hon. Lewis J. Liman, U.S.D.J.